

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

INSIGNIA SYSTEMS, INC.,

Plaintiff,

v.

NEWS CORPORATION, NEWS
AMERICA MARKETING FSI L.L.C.,
and NEWS AMERICA MARKETING
IN-STORE SERVICES L.L.C.,

Defendants.

Case No. 19-cv-1820 (MJD/BRT)

**JOINT MOTION REGARDING
CONTINUED SEALING**

Documents have been filed under temporary seal in connection with the following motions. The Court approved a combined briefing schedule [Dkt. No. 67] for the cross motions:

Defendants' Motion for Judgment on the Pleadings [Dkt. No. 46]

Plaintiff's Cross Motion for Judgment on the Pleadings [Dkt. No. 59]

Pursuant to LR 5.6, the parties submit this Joint Motion Regarding Continued Sealing.

Dated: January 6, 2020

s/ S. Jamal Faleel

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Proposed Revised Joint Motion Regarding Continued Sealing Form – incorporating edits to LR 5.6(d)(2)(A)

DKT. NO.	DKT. NO. OF REDACTED VERSION (IF FILED)	DESCRIPTION OF DOCUMENT	PRECISELY IDENTIFY: a) The information that the parties agree should remain sealed; b) The information the parties agree should be unsealed; and c) The information about which the parties disagree.	NONPARTY THAT DESIGNATED DOC. CONFIDENTIAL (IF ANY)	REASON WHY DOCUMENT SHOULD REMAIN SEALED OR BE UNSEALED
50		Settlement Agreement and Release	a) The entirety of the Settlement Agreement and Release. b) None c) None	NA	Contains material designated as “CONFIDENTIAL information” by the terms of the document and under a protective order issued in this case [Dkt. No. 57]
61	65	Plaintiff’s Memorandum of Law in Opposition to Defendants’ Motion for Judgment on the Pleadings and in Support of Plaintiff’s Cross-Motion for Judgment on the Pleadings, filed under temporary seal	a) None b) The entirety of the Memorandum of Law. c) None	NA	The parties have agreed that the entire document should be unsealed in light of Defendants’ briefs [Dkt. Nos. 48 and 70], which contained similar quotes from the Settlement Agreement and Release and were not filed under seal.
71	72	Plaintiff’s Reply Memorandum in Support of Plaintiff’s Cross-Motion for Judgment on the Pleadings, filed under temporary seal	a) None b) The entirety of the Reply Memorandum. c) None	NA	The parties have agreed that the entire document should be unsealed in light of Defendants’ briefs [Dkt. Nos. 48 and 70], which contained similar quotes from the Settlement Agreement and Release and were not filed under seal.